

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Raymond C. Staley Debtor(s) <hr/> PENNYMAC LOAN SERVICES, LLC Movant v. Raymond C. Staley and Scott Waterman, Esquire Respondents	20-13812 AMC Chapter 13 Proceeding
--	---

CERTIFICATION OF DEFAULT

PENNYMAC LOAN SERVICES, LLC, a secured creditor in the above captioned bankruptcy case, by and through its counsel, Jill Manuel-Coughlin, Esquire of the law firm of POWERS KIRN, LLC, hereby files this certification, and states:

1. I am the attorney responsible for handling the instant matter for PENNYMAC LOAN SERVICES, LLC, and I have sufficient knowledge to make this certification on its behalf.
2. On 09/30/2021, an Order was issued by this Court approving the Stipulation resolving PENNYMAC LOAN SERVICES, LLC's motion for relief from stay, a copy of which Order is attached hereto as **EXHIBIT A**. The Order provides for the cure of post-petition arrearage, and that in the event the Debtor fails to make the payments the secured creditor is permitted ex parte relief to vacate the stay, with notice to the trustee, debtor(s), and debtor's attorney, if any.
3. Debtor(s) has/have failed to comply with the aforesaid order by either missing payments and/or by failing to make the correct payments as summarized on the Notice of Default which was sent to all interested parties on 02/09/2022. A copy of the Notice of Default is attached as **EXHIBIT B**.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay without numerous court appearances.
5. I certify the above statements to be true. I am aware that if the above statements are willfully false, I am subject to punishment.

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

Dated: March 3, 2022

By: /s/ Jill Manuel-Coughlin
Jill Manuel-Coughlin, Esquire
ID# 63252
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053
Telephone: 215-942-2090
Attorney for Movant